

Ellen Kelly
Counselor at Law

2520032903435

150 Norwich Court
Lake Bluff, Illinois 60044
(708) 295-0290

December 18, 1992

Top Hat Exemption
Pension and Welfare Benefits Administration
Room N-5644
U. S. Department of Labor
200 Constitution Avenue, N. W.
Washington, D. C. 20210

Gentlemen:

This notice is given on behalf of my client Graybar Electric Company, Inc. pursuant to Department of Labor Regulation §2530.104-23, which provides an alternate method of complying with certain reporting and disclosure requirements of the Employee Retirement Income Security Act of 1974, as amended, with respect to unfunded plans of deferred compensation maintained by an employer for a select group of management or highly compensated employees.

Employer Name: Graybar Electric Company, Inc.
Employer Address: 34 North Meramec Avenue
P. O. Box 7231
St. Louis, Missouri 63177
Employer I. D. No.: 13-0794380

17,979

Graybar Electric Company, Inc. currently maintains two unfunded plans of deferred compensation for a select group of management or highly compensated employees:

1. the Supplemental Benefit Plan, under which approximately 12 current and retired employees are or have been entitled to benefits, and
2. a voluntary Deferred Compensation Program, which is currently available to approximately 30 employees, and under which about 29 current and retired employees have exercised their right to defer

Ellen Kelly, Esq.

Top Hat Plan Exemption

2

December 18, 1992

income and remain entitled to benefits.

This notice supersedes and replaces a prior notice submitted on the Company's behalf dated July 19, 1989, a copy of which is attached.

Graybar Electric Company, Inc. or I will provide any additional information you wish about either of these programs.

Very truly yours,

Ellen Kelly

Manually signed copy, with check for penalty to:

Pension and Welfare Benefits Administration ✓
P. O. Box 75212
Washington, D.C. 20013-5212

Ellen Kelly
Counselor at Law

150 Norwich Court
Lake Bluff, Illinois 60044
(312) 295-0290

July 19, 1989

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5644
U. S. Department of Labor
200 Constitution Avenue
Washington, D. C. 20210

Gentlemen:

This notice is given on behalf of my client Graybar Electric Company, Inc. pursuant to Department of Labor Regulation Section 2520.104-23, providing an alternate method of complying with certain reporting and disclosure requirements of the Employee Retirement Income Security Act of 1974, as amended, with respect to an unfunded plan maintained for the benefit of a select group of management or highly compensated employees.

Employer Name: Graybar Electric Company, Inc.

Employer Address: 34 North Meramec Avenue
P. O. Box 7231
St. Louis, Missouri 63177

Employer I. D. No.: 13-0794380

Graybar Electric Company, Inc. maintains a single plan, the Supplemental Benefit Plan (the "Plan"), for the purpose of providing deferred compensation to a select group of its management employees who are highly compensated. The Plan currently covers approximately 25 individuals.

Either Graybar Electric Company, Inc. or I will be glad to provide any additional information which may be required.

Very truly yours,

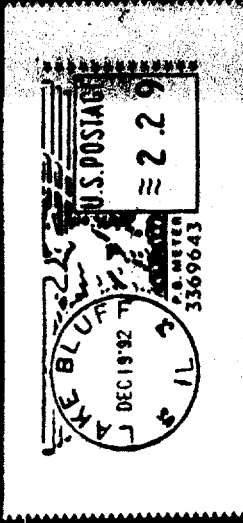
EK

17,979

CERTIFIED

P 100 456 790

MAIL



ELLEN KELLY, ESQ.
150 Norwich Court
Lake Bluff, IL 60044-1914

Pension and Welfare Benefits
Administration
P. O. Box 75212
Washington, D.C. 20013-5212